

**EXHIBIT U TO
CISNEROS DECLARATION
REDACTED VERSION**

16 | Reported by: Anne Torreano, CSR No. 10520

10:54:13 1 who contacted you?

10:54:14 2 A. I do.

10:54:14 3 Q. What is it?

10:54:15 4 A. Egon Zender.

10:54:16 5 Q. And who did you interview with at Google?

10:54:22 6 A. I don't remember everyone I interviewed with,

10:54:26 7 but the list included Alan Eustace, Omid Kordestani,

10:54:33 8 Shona Brown, Jonathan Rosenberg, George Reyes. Oh, and

10:54:46 9 members of what would eventually be my staff. So Stacy

10:54:49 10 Sullivan, Judy Gilbert, Arnonn Geshuri, Liane Hornsey,

10:54:55 11 which was a phone interview, Sue Wuthrich.

10:55:00 12 There were others. I don't recall who they

10:55:01 13 were.

10:55:01 14 Q. Okay. I'd like to ask you some questions

10:55:26 15 about Google's compensation system.

10:55:29 16 A. Okay.

10:55:33 17 THE WITNESS: Could I grab a little water?

10:55:35 18 MS. SHAVER: Sure.

10:55:35 19 Why don't we go off the record for a few

10:55:37 20 minutes?

10:55:37 21 THE WITNESS: Is that -- I just -- okay.

10:55:40 22 Thanks.

10:55:40 23 THE VIDEOGRAPHER: We're off the record at

10:55:41 24 10:54.

10:56:43 25 (RECESS TAKEN.)

11:04:25 1 THE VIDEOGRAPHER: We're back on the record at

11:04:52 2 11:03.

11:04:54 3 BY MS. SHAVER:

[REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED]

11:05:09 8 Q. And do you recall approximately when that
11:05:11 9 happened?

11:05:11 10 A. I don't. It was sort of mid to lateish 2000s,
11:05:15 11 but I don't recall specifically when.

11:05:16 12 Q. Okay. And do you remember -- were you
11:05:18 13 involved in that decision?

11:05:20 14 A. Yes.

[REDACTED] [REDACTED]
[REDACTED] [REDACTED]

[REDACTED] [REDACTED]
[REDACTED] [REDACTED]
11:08:00 3 MS. SHAVER: I'd like to mark this as an
11:08:03 4 exhibit.

11:08:03 5 (DEPOSITION EXHIBIT 2418 MARKED.)

11:08:03 6 BY MS. SHAVER:

11:08:03 7 Q. This document is Bates-stamped
11:08:08 8 GOOG-HIGH-TECH-329873.

11:08:11 9 Mr. Bock, throughout the day I'm going to be
11:08:13 10 putting documents in front of you which are what we
11:08:16 11 call exhibits.

11:08:16 12 A. Okay.

11:08:17 13 Q. You are always welcome to read as much of the
11:08:20 14 exhibit as you like. Frequently I will be asking you a
11:08:23 15 question about a specific part of it, and if so, I'll
11:08:25 16 point you to it. But you can always say, "Hey, I'd
11:08:28 17 like more time to get the full context."

11:08:31 18 Okay?

11:08:31 19 A. Okay. Thank you.

11:08:33 20 Q. So in this document I'm just interested in the
11:08:35 21 very first sentence where you -- well, first of all, do
11:08:37 22 you recognize this document?

11:08:38 23 A. I don't remember this one specifically, but it
11:08:41 24 says it's from me, so I believe it's from me.

The figure consists of a 20x20 grid of black bars on a white background. The bars are solid black and vary in length and position within the grid cells. The pattern of bars is as follows:

- Row 1: 1 bar (left), 1 bar (right)
- Row 2: 1 bar (left), 1 bar (right)
- Row 3: 1 bar (left), 1 bar (right)
- Row 4: 1 bar (left), 1 bar (right)
- Row 5: 1 bar (left), 1 bar (right)
- Row 6: 1 bar (left), 1 bar (right)
- Row 7: 1 bar (left), 1 bar (right)
- Row 8: 1 bar (left), 1 bar (right)
- Row 9: 1 bar (left), 1 bar (right)
- Row 10: 1 bar (left), 1 bar (right)
- Row 11: 1 bar (left), 1 bar (right)
- Row 12: 1 bar (left), 1 bar (right)
- Row 13: 1 bar (left), 1 bar (right)
- Row 14: 1 bar (left), 1 bar (right)
- Row 15: 1 bar (left), 1 bar (right)
- Row 16: 1 bar (left), 1 bar (right)
- Row 17: 1 bar (left), 1 bar (right)
- Row 18: 1 bar (left), 1 bar (right)
- Row 19: 1 bar (left), 1 bar (right)
- Row 20: 1 bar (left), 1 bar (right)

11:10:26 1 Q. Okay. Thanks.

11:10:36 2 A. Oh, but one other thing. It may not be from

11:10:39 3 me because it says, "Let me or Laszlo know if you have

11:10:43 4 any further questions" on the bottom, so the "From" is

11:10:46 5 a little confusing to me, but ...

[REDACTED]

11:11:33 14 A. No, that's not correct.

11:11:34 15 MR. RUBIN: Objection.

11:11:35 16 Give me one second.

11:11:37 17 THE WITNESS: Oh, sorry.

11:11:37 18 MR. RUBIN: Objection. Form.

11:11:39 19 THE WITNESS: No.

11:11:40 20 MR. RUBIN: Now you can answer.

11:11:41 21 THE WITNESS: That is not correct.

11:11:43 22 BY MS. SHAVER:

[REDACTED]

[REDACTED]

[REDACTED]

11:11:54 1 MR. RUBIN: Objection. Form.
[REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED]
11:12:04 5 BY MS. SHAVER:
11:12:04 6 [REDACTED] [REDACTED]
11:12:09 7 MR. RUBIN: Objection. Form.
[REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

11:14:19 2 MR. RUBIN: Objection. Form.

[REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

11:14:51 11 BY MS. SHAVER:

[REDACTED] [REDACTED]

11:15:53 24 MR. RUBIN: Objection. Form.

[REDACTED] [REDACTED]

The figure consists of a 20x20 grid of black bars. The bars are primarily short and horizontal, representing the majority of data points. There are several longer horizontal bars, particularly in the upper and lower sections. Additionally, there are a few vertical bars on the left side of the grid, and a few other bars that are longer than the standard horizontal ones.

11:16:45 24

MR. RUBIN: Objection. Form.

A 20x20 grid of black bars on a white background. The bars are arranged in a pattern where most are horizontal, but some are vertical or partially cut off. The grid is bounded by a thick black border.

The figure consists of a 20x20 grid of black bars on a white background. The bars are arranged in a pattern where most cells are empty, while some cells contain a single bar or a group of bars. The bars are of varying lengths, with some being very short and others extending across the width of multiple cells. The pattern is roughly triangular, with the highest density of bars in the lower-right half of the grid.

11:19:53 1

MR. RUBIN: Objection. Form.

The figure consists of a 20x20 grid of black bars. Each bar's height represents a data value for that specific row and column. The bars are arranged in a grid pattern, with some bars being significantly taller than others, indicating varying data values. The grid is composed of 20 horizontal rows and 20 vertical columns of bars.

11:23:21 1 where everybody else's is.

11:23:24 2 At Google what we do, which is a little

11:23:26 3 different -- so to be more precise, [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

11:23:51 9 MS. SHAVER: I'd like to mark this as the next

11:23:53 10 exhibit.

11:23:53 11 (DEPOSITION EXHIBIT 2419 MARKED.)

11:24:02 12 BY MS. SHAVER:

11:24:02 13 Q. This document is Bates-stamped

11:24:05 14 GOOG-HIGH-TECH-195260.

11:24:10 15 Mr. Bock, do you recognize this document?

11:24:12 16 A. Let me just look at it.

11:24:36 17 Okay.

11:24:36 18 Q. Do you recognize this document?

11:24:37 19 A. I do.

11:24:38 20 Q. What is it?

11:24:39 21 A. It's a correspondence between Eric and me that

11:24:45 22 I then forwarded to the folks on the benefits and

11:24:51 23 compensation teams.

11:24:51 24 Q. And in the first e-mail from Eric Schmidt,

11:24:57 25 he's -- he asks you to do another survey of benefits in

11:47:29 1 no impact at all.

11:47:29 2 In a handful of cases, some people talked

11:47:31 3 about it and heard about it, and a few Googlers, you

11:47:34 4 know, didn't like that, but it had no real impact.

11:48:17 5 BY MS. SHAVER:

11:48:17 6 Q. I believe you testified earlier that while

11:48:19 7 individual managers at Google may be concerned with pay

11:48:22 8 fairness on their team, that wasn't the overall

11:48:24 9 perspective of the company.

11:48:26 10 Is that a fair characterization of what you

11:48:28 11 said?

11:48:28 12 A. Roughly, yeah.

11:48:29 13 Q. Okay. Does this e-mail from Sergey Brin, one

11:48:31 14 of the founders of the company, specifically inquiring

11:48:33 15 about internal equity change your testimony at all?

11:48:36 16 MR. RUBIN: Objection. Form.

11:48:37 17 THE WITNESS: No. I don't know why it would.

11:48:43 18 The -- I mean, one thing to understand here,

11:48:45 19 too, is that as we develop these programs, there was

11:48:49 20 some people who thought it would be a good idea and

11:48:51 21 some people thought it would be a bad idea. Sergey

11:48:54 22 here is asking a question about, you know, why are we

11:48:56 23 doing this and what is the advantage to it?

11:48:58 24

[REDACTED]

[REDACTED]

[REDACTED] [REDACTED]
[REDACTED] [REDACTED]
11:49:25 3 BY MS. SHAVER:

[REDACTED] [REDACTED]
[REDACTED] [REDACTED]
11:49:55 6 MS. SHAVER: Can I have 39?

11:50:10 7 Please mark this as the next exhibit.

11:50:11 8 (DEPOSITION EXHIBIT 2422 MARKED.)

11:50:20 9 BY MS. SHAVER:

11:50:20 10 Q. This document is Bates-stamped

11:50:25 11 GOOG-HIGH-TECH-328300.

11:50:29 12 Mr. Bock, do you recognize this document?

11:50:36 13 A. I don't remember it, but, you know, it's an
11:50:44 14 e-mail that I'm on.

11:50:46 15 Q. Okay. If you look at the chart that's on page
11:50:59 16 1, can you explain to me what this chart reflects?

11:51:03 17 A. Yeah, let me look at this more broadly and see
11:51:08 18 what this is.

11:51:16 19 Okay. Sorry. Your question again? I
11:51:54 20 apologize.

11:51:54 21 Q. The question was about what the chart
11:51:58 22 reflects.

11:51:59 23 A. [REDACTED]
[REDACTED]
[REDACTED]

11:58:18 1 A. No, no, no. I wrote, how do we address

11:58:20 2 Sheryl's concern it sends a bad message? I didn't say

11:58:23 3 anything about whether I agree or what I think. That's

11:58:25 4 what Sheryl said.

11:58:26 5 If -- you should ask Sheryl. I don't know

11:58:28 6 what she meant.

11:58:29 7 Q. Yeah, my question is a little bit different.

11:58:32 8 It's not what she meant. It's the words you chose to

11:58:35 9 use in your e-mail.

11:58:36 10 MR. RUBIN: Objection. Well, objection. No

11:58:38 11 question. So to form, to the extent there's not a

11:58:42 12 question.

11:58:42 13 BY MS. SHAVER:

11:58:42 14 Q. Did you do anything to address Sheryl's

11:58:44 15 concern?

11:58:45 16 A. I asked Allan and Jon for context.

11:58:51 17 Q. And was there any outcome to that discussion?

11:58:54 18 Did you end up addressing it in any way?

11:58:56 19 A. I don't recall, but I don't think we did. I

11:58:58 20 don't recall specifically, but I don't think we did.

11:59:00 21 Allan's right. I mean, I want to be precise.

11:59:09 22 I'm confident we didn't make any substantial changes as

11:59:12 23 a result of that request.

11:59:15 24 MS. SHAVER: Can I have 41, please?

11:59:51 25 Actually, hold off.

A 20x20 grid of black bars representing data points. The bars are arranged in a pattern where most are long and thin, with a few being significantly shorter. The grid is bounded by a thick black border.

The figure consists of a 20x20 grid of black bars on a white background. The bars are solid black and vary in length. The pattern of bars is as follows:

- Row 1: 1 bar (long), 1 bar (short)
- Row 2: 1 bar (long), 1 bar (short)
- Row 3: 1 bar (short), 1 bar (long)
- Row 4: 1 bar (long), 1 bar (short)
- Row 5: 1 bar (short), 1 bar (long)
- Row 6: 1 bar (long), 1 bar (short)
- Row 7: 1 bar (short), 1 bar (long)
- Row 8: 1 bar (long), 1 bar (short)
- Row 9: 1 bar (short), 1 bar (long)
- Row 10: 1 bar (long), 1 bar (short)
- Row 11: 1 bar (short), 1 bar (long)
- Row 12: 1 bar (long), 1 bar (short)
- Row 13: 1 bar (short), 1 bar (long)
- Row 14: 1 bar (long), 1 bar (short)
- Row 15: 1 bar (short), 1 bar (long)
- Row 16: 1 bar (long), 1 bar (short)
- Row 17: 1 bar (short), 1 bar (long)
- Row 18: 1 bar (long), 1 bar (short)
- Row 19: 1 bar (short), 1 bar (long)
- Row 20: 1 bar (long), 1 bar (short)

The figure consists of a 15x15 grid of black bars. The bars are of various lengths and orientations. Most bars are horizontal, spanning multiple columns. Some bars are vertical or shorter horizontal segments. The grid is enclosed in a thick black border.

12:05:34 17 MS. SHAVER: Let's take a break.

12:05:35 18 THE VIDEOGRAPHER: We're going off record at

12:05:40 19 12:04.

12:05:43 20 (RECESS TAKEN.)

12:25:57 21 THE VIDEOGRAPHER: We're back on the record at

12:26:24 22 12:25. This is the beginning of video No. 2.

12:26:35 23 MS. SHAVER: I'd like to mark the next

12:26:38 24 exhibit, please.

12:26:39 25 (DEPOSITION EXHIBIT 2423 MARKED.)

A 20x20 grid of black bars representing data points. The bars are arranged in a grid pattern, with some bars being significantly taller than others, indicating varying data values. The grid is bounded by a thick black border.

[REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED]
12:34:58 3 A. Okay. Good.

12:34:59 4 MS. SHAVER: I'd like to introduce the next
12:35:01 5 exhibit, please.

12:35:02 6 (DEPOSITION EXHIBIT 2425 MARKED.)

12:35:11 7 MR. RUBIN: Just to be clear, you weren't
12:35:12 8 suggesting I -- I didn't interpret it that way, but
12:35:14 9 just so it's clear in the transcript, you weren't
12:35:16 10 suggesting I didn't produce them before. You just have
12:35:18 11 it today?

12:35:19 12 MS. SHAVER: That's correct, yeah.

12:35:20 13 THE WITNESS: You're not going to make me read
12:35:22 14 this whole thing; right?

12:35:24 15 MS. SHAVER: I'm not.

12:35:25 16 THE WITNESS: Okay.

12:35:26 17 BY MS. SHAVER:

[REDACTED] [REDACTED]
[REDACTED] [REDACTED]

The figure consists of a 20x20 grid of black bars on a white background. The bars are arranged in a pattern where most rows have a single bar, while some rows have multiple bars. The bars are of varying lengths and are positioned at different horizontal and vertical offsets from the grid lines. The pattern is as follows:

- Row 1: 1 bar (length ~18)
- Row 2: 1 bar (length ~18)
- Row 3: 1 bar (length ~18)
- Row 4: 1 bar (length ~18)
- Row 5: 1 bar (length ~18)
- Row 6: 1 bar (length ~18)
- Row 7: 1 bar (length ~18)
- Row 8: 1 bar (length ~18)
- Row 9: 1 bar (length ~18)
- Row 10: 1 bar (length ~18)
- Row 11: 1 bar (length ~18)
- Row 12: 1 bar (length ~18)
- Row 13: 1 bar (length ~18)
- Row 14: 1 bar (length ~18)
- Row 15: 1 bar (length ~18)
- Row 16: 1 bar (length ~18)
- Row 17: 1 bar (length ~18)
- Row 18: 1 bar (length ~18)
- Row 19: 1 bar (length ~18)
- Row 20: 1 bar (length ~18)
- Row 11: 1 bar (length ~18), 1 bar (length ~18)
- Row 14: 1 bar (length ~18), 1 bar (length ~18)
- Row 17: 1 bar (length ~18), 1 bar (length ~18)
- Row 18: 1 bar (length ~18), 1 bar (length ~18)
- Row 19: 1 bar (length ~18), 1 bar (length ~18)
- Row 20: 1 bar (length ~18), 1 bar (length ~18)
- Row 12: 1 bar (length ~18), 1 bar (length ~18)
- Row 13: 1 bar (length ~18), 1 bar (length ~18)
- Row 15: 1 bar (length ~18), 1 bar (length ~18)
- Row 16: 1 bar (length ~18), 1 bar (length ~18)
- Row 17: 1 bar (length ~18), 1 bar (length ~18)
- Row 18: 1 bar (length ~18), 1 bar (length ~18)
- Row 19: 1 bar (length ~18), 1 bar (length ~18)
- Row 20: 1 bar (length ~18), 1 bar (length ~18)
- Row 10: 1 bar (length ~18), 1 bar (length ~18)
- Row 11: 1 bar (length ~18), 1 bar (length ~18)
- Row 12: 1 bar (length ~18), 1 bar (length ~18)
- Row 13: 1 bar (length ~18), 1 bar (length ~18)
- Row 14: 1 bar (length ~18), 1 bar (length ~18)
- Row 15: 1 bar (length ~18), 1 bar (length ~18)
- Row 16: 1 bar (length ~18), 1 bar (length ~18)
- Row 17: 1 bar (length ~18), 1 bar (length ~18)
- Row 18: 1 bar (length ~18), 1 bar (length ~18)
- Row 19: 1 bar (length ~18), 1 bar (length ~18)
- Row 20: 1 bar (length ~18), 1 bar (length ~18)
- Row 1: 1 bar (length ~18)
- Row 2: 1 bar (length ~18)
- Row 3: 1 bar (length ~18)
- Row 4: 1 bar (length ~18)
- Row 5: 1 bar (length ~18)
- Row 6: 1 bar (length ~18)
- Row 7: 1 bar (length ~18)
- Row 8: 1 bar (length ~18)
- Row 9: 1 bar (length ~18)
- Row 10: 1 bar (length ~18)
- Row 11: 1 bar (length ~18)
- Row 12: 1 bar (length ~18)
- Row 13: 1 bar (length ~18)
- Row 14: 1 bar (length ~18)
- Row 15: 1 bar (length ~18)
- Row 16: 1 bar (length ~18)
- Row 17: 1 bar (length ~18)
- Row 18: 1 bar (length ~18)
- Row 19: 1 bar (length ~18)
- Row 20: 1 bar (length ~18)

12:41:52 6 (DEPOSITION EXHIBIT 2426 MARKED.)

12:43:13 1 finalizing."

12:43:13 2 Do you see that?

12:43:14 3 A. I do.

12:43:14 4 Q. Does this refresh your recollection that you

12:43:16 5 did share compensation and salary budget information

12:43:21 6 with competitors?

12:43:22 7 MR. RUBIN: Objection. Form.

12:43:24 8 THE WITNESS: It doesn't change my perspective

12:43:27 9 at all. As I said, I have not shared any information

12:43:29 10 of this kind with other companies.

12:43:32 11 BY MS. SHAVER:

12:43:32 12 Q. Has Google shared that information, to your

12:43:34 13 knowledge?

12:43:35 14 A. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

12:43:51 20 And in fact, since our number wasn't

12:43:54 21 determined, it would be hard -- and the point of the

12:43:56 22 e-mail is to discuss what it should be, I'm not sure we

12:44:00 23 would have anything to share.

12:44:01 24 The other point I'd make is that the companies

12:44:05 25 run different cycles and the timing is different. So

This figure consists of a 20x20 grid of black bars on a white background. The bars are of varying lengths and are positioned in a staggered, overlapping manner. The pattern is such that most bars are mostly hidden by others, creating a complex visual effect. The bars are arranged in a grid-like structure, but the overlapping and varying lengths create a sense of depth and complexity.

1 REPORTER'S CERTIFICATE

2 I, Anne Torreano, Certified Shorthand
3 Reporter licensed in the State of California, License
4 No. 10520, hereby certify that the deponent was by me
5 first duly sworn, and the foregoing testimony was
6 reported by me and was thereafter transcribed with
7 computer-aided transcription; that the foregoing is a
8 full, complete, and true record of said proceedings.

9 I further certify that I am not of counsel or
10 attorney for either or any of the parties in the
11 foregoing proceeding and caption named or in any way
12 interested in the outcome of the cause in said
13 caption.

14 The dismantling, unsealing, or unbinding of
15 the original transcript will render the reporter's
16 certificates null and void.

17 In witness whereof, I have subscribed my name
18 this 9th day of April, 2013.

19
20 [] Reading and Signing was requested.

21 [] Reading and Signing was waived.

22 [X] Reading and Signing was not requested.

23

24

25

ANNE M. TORREANO, CSR No. 10520

**CORRECTIONS TO DEPOSITION TRANSCRIPT OF
LASZLO BOCK, DATED MARCH 27, 2013**

*In re High-Tech Employee Antitrust Litigation
Case No. 11-CV-2509-LHK (N.D. Cal.)*

Page:Line	Amendment	Reason for Amendment
22:20	Replace: "Degan" With: "Deegan"	correction to transcript error
27:11-12	Replace: "Stacy and" With: "Stacy who"	correction and clarification
29:7	Replace: "Degan" With: "Deegan"	correction to transcript error
34:25	Replace: "executive office" With: "executive offers"	correction and clarification
36:5	Replace: "recollection on" With: "recollecting"	correction to transcript error
50:10	Replaced: "comp-out comps" With: "comp outcomes"	correction to transcript error
65:5	Replace: "contemporaneous" With: "contemporaneously"	correction to transcript error
71:2	Delete "So yeah"	correction and clarification
75:1	Replace: "Alan" With: "Allan"	correction to transcript error
75:10	Replace: "manager" With: "major"	correction to transcript error
75:16	Replace: "are" With: "have"	correction and clarification
88:23	Replace: "what guidelines"	correction and clarification

Page:Line	Amendment	Reason for Amendment
	With: "the guidelines"	
111:8	Replace: "on the press" With: "in the press"	correction to transcript error
111:9-10	Replace: "what else would they look at." With: "what else would they look at?"	correction to transcript error
141:10	Replace: "has not" With: "doesn't have"	correction and clarification
148:5	Replace: "get" With: "got"	correction to transcript error
156:20	Insert "more" after "Certainly"	correction and clarification

Subject to the above changes, I certify that the transcript is true and correct.



Signature



Date